

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFF LUCAS,

Plaintiff,

-against-

VERIZON COMMUNICATIONS INC and
VERIZON MEDIA, INC.,

Defendant.

Civil Action No.:

Electronically Filed

DECLARATION OF RON JOHNSTONE

I, Ron Johnstone, hereby declare:

1. I submit this declaration in support of Defendant Verizon Communications Inc., d/b/a Verizon Media, Inc.’s¹, (“Verizon Media” or the “Company”) Notice of Removal.

2. I am Vice President, Deputy General Counsel, Employment Counsel Law for Verizon Media.

3. In my position with Verizon Media, I know and understand the corporate structure of Verizon Media, and the location and function of the Company’s headquarters and principal place of business.

4. I know the facts in this declaration to be true of my own personal knowledge or based on records kept in the Company’s ordinary course of business.

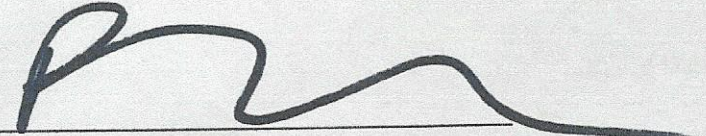
5. If called as a witness, I could and would testify competently under penalty of perjury to the matters set forth in this declaration.

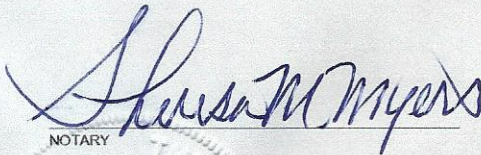
¹ Plaintiff identified the incorrect legal entity in his Complaint. Plaintiff was employed by Verizon Communications, Inc., d/b/a Verizon Media, Inc.

6. Verizon Media is a corporation organized under the laws of the State of Delaware and maintains its principal place of business in the State of New Jersey.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17th day of July 2020.


Ron Johnstone


NOTARY

Dated: July 17, 2020

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
THERESA M. MYERS, Notary Public
City of Philadelphia, Philadelphia County
My Commission Expires October 12, 2021